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AT CHARLOTTESVILLE, VA
FILED

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IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION
DECEMBER 2011 SESSION

UNITED STATES OF AMERICA

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Criminal No.: 5:11CR00045

v.

JOHN STUART DOWELL

18 U.S.C. §§ 2251(a) and 2251(e)

INDICTMENT

Count One

The Grand Jury charges:

That between in or about November 2010 and in or about October 2011, the exact date(s) being unknown to the Grand Jury, in the Western Judicial District of Virginia and elsewhere, the defendant, JOHN STUART DOWELL, did employ, use, persuade, induce, entice, or coerce a minor girl, who was then approximately three years old, to engage in sexually explicit conduct, including oral-genital contact and oral-anal contact with the defendant, and the lascivious exhibition of the minor's genitals or pubic area, for the purpose of producing visual depictions of such conduct, namely, videos, knowing or having reason to know that such visual depictions would be transported using any means or facility of interstate or foreign commerce or transported in or affecting interstate or foreign commerce, or which visual depictions were transported using any means or facility of interstate and foreign commerce or were transported in or affecting interstate or foreign commerce, or which visual depictions were produced using materials that had been mailed, shipped, or

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transported in or affecting interstate or foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

A TRUE BILL, this 14th day of December, 2011.

Kieran McCarthy
FOREPERSON

Timothy J. Heaphy (21218)
TIMOTHY J. HEAPHY
UNITED STATES ATTORNEY